

REMARKS

Reconsideration is respectfully requested.

Rejection under 35 U.S.C. 112, ¶1 (Enablement)

Claims 2 and 3 were rejected for failure to comply with the enablement requirement on the ground that Fig. 2 cannot show both an internal and external interface at the same time. The answer to this point is that Fig. 2 is a functional block diagram that shows the ATM switch 24 and the MAG 26 but doesn't purport to represent actual physical structure. As discussed in the specification on page 5, lines 18-23, the components 24 and 26 as shown in Fig. 2 can be situated on separate computer platforms and communicate via an external interface, or they can be situated on the same computer platform and communicate via an internal interface. Being functional in nature, Fig. 2 can properly represent both implementations.

Rejection under 35 U.S.C. 112, ¶1 (single means claim)

Claim 23 was rejected as being a single means claims. This rejection would appear to be unwarranted insofar as claim 23 is a dependent claim. It appears, however, that claim 23 should correctly depend from claim 21, not claim 2, and has been amended accordingly.

Rejections under 35 U.S.C. 102 and 103

Claims 1-31 were variously rejected under 35 U.S.C. 102 and 103 on the basis of the principal reference Doshi et al. (5,483,527) and the secondary reference McDysan (6,226,260). Applicants respectfully traverse.

Doshi is directed to a system that interfaces an ATM network with an STM network by utilizing ATM switches 215 and 220 in a manner analogous to circuit switches to set up a single end-to-end connection between call parties S1 and S2. This is seen from the call setup discussion at

column 4, line 23 to column 5, line 26. The only difference between the Doshi system and an ATM network is that Doshi uses ATM switches to route packets over the end-to-end connection.

The present invention is distinct from Doshi in that an ATM PAG terminates two connections, one from a first ATM endpoint and the other from a second ATM endpoint, and then logically concatenates the connections into an active ATM bearer path extending between the first and second endpoints. In this context, "termination" does not refer to ending a call, as suggested by the Office Action's use of the term "hang-up" to refer to a connection termination. Rather, a connection "termination" is a functional entity signifying an endpoint of a connection. As set forth in the amendment to claims 1, 11, 22 and 31, each termination in the ATM PAG is associated with an address. As explained in the specification, these termination addresses are used for call setup signaling to establish the two bearer connections to the ATM PAG. Note that Doshi at column 4, line 45 refers to the switch 215 as having only one address that is used for sending signaling messages to the switch 215 so that it can participate in setting up the single end-to-end connection between the call parties. The Doshi switches 215 and 220 do not themselves terminate bearer connections. They simply receive packets from a previous switch on incoming trunks, perform address translation, and forward the packets to the next switch on outgoing trunks. This is how any switch operates.

The dependent claims offer further grounds for distinguishing the claimed subject matter over Doshi, as follows:

Claims 2, 19 and 29 – Doshi does not specifically disclose that the call processor 215-2 and the switch fabric 215-4 are on the same computer platform. Like Applicants' Fig. 2, Doshi's Fig. 1 is a functional block diagram in which physical layouts are not defined.

Claim 3 – Doshi does not specifically disclose that the call processor 215-2 and the switch fabric 215-4 are on separate computer platforms. Like Applicants' Fig. 2, Doshi's Fig. 1 is a functional block diagram in which physical layouts are not defined.

Claims 4, 17 and 27 – Doshi and McDysan do not disclose or suggest the use of UNI proxy signaling. McDysan shows UNI bearer pathways, but not discuss UNI proxy signaling.

Claims 5, 18 and 28 – Doshi does not disclose the use of an API between the call processor 215-2 and the switching fabric 215-4. The Office Action's reliance on so-called "well known" art is challenged under MPEP 2144.03 and a declaration is requested. Moreover, the final sentence of the rejection of claims 5, 18 and 28 is not understood. Applicants' specification does not mention a "conversion of one packet format to another packet format" in the interface between the MAG 26 and the ATM switch 24.

Claims 7, 13 and 23 – Doshi and McDysan fail to disclose or suggest a system that includes an ATM PAG, an ATM LAG, an ATM TAG and an ATM access network interconnecting these components. Components 405 and 410 of McDysan's Fig. 4 appear to represent a form of TAG, but it is a FR-ATM TAG. There is no teaching or suggestion of the other components of claims 7, 13 and 23.

Claims 9, 16 and 26 – Doshi does not disclose more than one ATM PAG and an ATM access network interconnecting the ATM PAGs. Elements 215 and 220 of Doshi are not ATM PAGs and element 210 does not interconnect 215 and 220 even if the latter were ATM PAGs.

Claims 10, 20 and 30 – Doshi does not disclose ATM signaling messages being intercepted by an ATM switch and forwarded to a MAG. Signaling messages arrive at Doshi's call processor 215-2 via an STP 250-1, a link 154 and the signal processor 215-1, not through the switching fabric 215-4.

Claims 14 and 24 – Doshi does not disclose providing a common call control entity for an ATM PAG, an ATM LAG and an ATM TAG. Doshi does not disclose an ATM LAG or an ATM TAG, and the signal processor 215-1 is not a call control entity.

In view of the foregoing, Applicants respectfully request that all rejections be withdrawn and that Notices of Allowability and Allowance be issued.

Applicants direct attention to the **CHANGE OF CORRESPONDENCE ADDRESS** form enclosed herewith, and request that the undersigned representative's new address information be entered into the file wrapper.

Respectfully submitted,



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